## Exhibit 4

## DECLARATION OF SHARAF ELDIN IBRAHIM BANNAGA

- I, Sharaf Eldin Ibrahim Bannaga, declare:
  - 1. I am a citizen of Sudan, residing at present in Birmingham, United Kingdom.
- 2. In 1971, I graduated from the University of Khartoum with a bachelor's degree in civil engineering.
- 3. In 1974, I have been granted an MSc in Civil Engineering from Loughborough University of Technology in the United Kingdom.
- 4. In 1977, I have been granted a PhD in Civil Engineering from Loughborough University of Technology.
- 5. From 1977 until 1978, I worked with Alexander Gibb & Partners, an engineering consulting firm in Reading, England.
  - 6. In 1978, I started working as a Senior Lecturer at Sudan University in Khartoum.
- 7. In 1979, I moved to Saudi Arabia where I worked as a civilian engineer in the Saudi Arabian National Guard (SANG) until 1989.
- 8. During this period, I worked closely with the Crown Prince and President of SANG, future King Abdullah bin Abdulaziz, as well as his deputy Sheikh Abdulaziz bin Abd al-Muhsin al-Tuwaijri. I used to convey their comments on SANG engineering projects to the United States Army Corps of Engineers, which was the engineering consultant for SANG.
- 9. In 1989, I returned to Sudan and became the Commissioner for Engineering for the State of Khartoum. This role turned into the State Minister of Engineering, and then Khartoum State Minister of Housing. I left the State of Khartoum government in April 2001.
- 10. Since April 2001, I have worked in the field of engineering consultation and construction, as well as a university lecturer in Sudan. Apart from performing engineering consultation and

construction, I founded the City College for Science and Technology, which is a university college located in Khartoum. I also own my own engineering and contracting firm, Qinwan Company for Environmental Protection and Improvement, and my own engineering consulting firm, Bannaga Consult.

- 11. I was awarded scientific and professional prizes and awards from reputable national, regional, and international institutions, including awards from the University of Khartoum, Juba University, and the University of Nottingham where I was appointed as an Honorary Professor. I also received awards from professional institutions such as the Institution of Water Engineers and Scientists, London, and the Federation of Arab Engineers, Arab League. I have been awarded the Order of the Loyal Son of Sudan.
- 12. I moved to Birmingham on January 26, 2024. I was displaced due to fighting in Khartoum after the Rapid Support Forces (RSF) rebelled against the Sudanese government.

## Osama bin Laden's expulsion from Sudan

- 13. After the Gulf War of the early 1990s, Sudan became politically isolated. While the Sudanese government condemned Saddam Hussein's invasion of Kuwait, it also opposed the use of Coalition Forces to liberate Kuwait. As a result of its political isolation, Sudan's economy suffered.
- 14. Through my work in the SANG, I had come to closely know then-Crown Prince Abdullah, who was the head of the National Guard, and Abdulaziz al-Tuwaijri, who was the deputy head of the National Guard.
- 15. In the mid-1990s, I took the initiative to attempt to improve Sudanese-Saudi relations by reaching out to the Crown Prince's office and to al-Tuwaijri to explore with them the normalization of relations between our countries.

16. After some persistence, I was able to speak directly with al-Tuwaijry informally. He informed me that Sudan's position in the Gulf War was a sticking point for Saudi Arabia and he requested that I come back to Saudi Arabia for an official visit. The former head of state of Sudan, General Abdel Rahman Swar al-Dahab, accompanied me on this later official visit to Saudi Arabia. On that visit, we met with Crown Prince Abdullah, Tuwaijry, and others. We focused on Sudanese-Saudi relations with Tuwaijry, who informed us that they appreciated the presence of General al-Dahab.

17. Tuwaijry informed us that another issue of concern for Saudi Arabia was the presence of Osama bin Laden in Sudan. This was the first time I had heard of Osama bin Laden. Tuwaijri requested that Sudan handover bin Laden to Saudi Arabia or that bin Laden otherwise be expelled from Sudan. The Saudi government considered bin Laden to be an opposition figure who could influence Muslim scholars and leaders against the Saudi government. Consequently, Saudi Arabia objected to such a prominent dissident living in Sudan.

- 18. I brought this message back to the Sudanese government.
- 19. I did not participate in any discussions between the Sudanese government and bin Laden about the Saudi government's message, but I understand that, in those discussions, bin Laden stated that he would be willing to return to Saudi Arabia on the condition that Saudi Arabia release certain scholars and Mujahideen who were detained in Saudi Arabia for criticizing the Saudi government. I was subsequently provided a sealed, handwritten letter from bin Laden to be delivered to the Saudi government. I did not open or read the letter from bin Laden, but I later came to understand the letter contained bin Laden's conditions for his return to Saudi Arabia.
- 20. In an official state trip to Saudi Arabia, I delivered the sealed, hand-written letter from bin Laden to Crown Prince Abdullah who handed the letter to Tuwaijry. Tuwaijry later informed

me of the contents of the letter and bin Laden's stated condition regarding the release of certain scholars and Mujahideen who were detained in Saudi Arabia.

- 21. According to Tuwaijry, bin Laden's conditions were unacceptable to Saudi Arabia. Tuwaijry stated that bin Laden could return to Saudi Arabia, but that it would need to be an unconditional return.
- 22. Sudan was eager to normalize relations with Saudi Arabia and I asked Tuwaijry what alternatives he may suggest if bin Laden refused to return to Saudi Arabia without conditions.
- 23. The next day Tuwaijry suggested that Sudan should expel bin Laden to either his ancestral home of Yemen or to Afghanistan.
- 24. I took this message back to Sudan where I discussed it with several Sudanese government officials.
- 25. I eventually received a call from Sudanese General Fatih, an advisor to the Sudanese President, who informed me that the Sudanese government had expelled bin Laden from Sudan and that he had gone to Afghanistan. After some time, I stopped over in Jeddah while coming from Turkey and reached out to the *Sharq Al-Awsat* newspaper and had an interview where I disclosed that Bin Laden had been expelled from Sudan. I later travelled to Saudi Arabia and informed Tuwaijry of bin Laden's expulsion from Sudan.

26. Following bin Laden's expulsion from Sudan, Sudanese-Saudi relations began to improve and Saudi Arabia agreed to help Sudan resolve some of its internal political issues of the time.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 23, 2025

Sharaf Eldin Ibrahim Bannaga